IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

SCOTT DENING, an individual,

Plaintiff,

v.

GLOBE LIFE AMERICAN INCOME DIVISION a/k/a AMERICAN INCOME LIFE INSURANCE COMPANY, and GLOBE LIFE INC.

Defendants.

Case No. 1:23-cv-1117

Hon. Hala Y. Jarbou

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(d)

Defendant American Income Life Insurance Company ("AIL"), by and through undersigned counsel, certifies that it has made good faith efforts to obtain concurrence by Plaintiff Scott Dehning with the relief requested in AIL's Motion for Attorneys' Fees and Costs, specifically, by sending an email on May 2, 2024 to counsel for Plaintiff Scott Dening and asking whether they would agree to pay \$13,659.56 in fees and costs, absent a court order. As of the filing of this Motion, Plaintiff's counsel did not respond.

Dated: May 2, 2024

Respectfully submitted,

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